

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

CRISTA STEVENS	:	
	:	CASE NO. 3:21-cv-01830-MEM
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
KEYSTONE CREDIT SERVICES, LLC	:	
	:	
Defendant.	:	
	:	
	:	
	:	

JOINT STIPULATION TO EXTEND DEADLINES

The parties, by and through their undersigned counsel, hereby submit this joint request to extend the discovery deadlines by 31 days for the fact discovery deadline and 30 days for the dispositive motion deadline in this action. The parties make this request because additional time is needed to conclude discovery. Counsel for the parties have amicably been exchanging in written discovery and the production of documents and additional time is needed to conclude discovery, depositions and explore the potential for resolution of this case. Depositions were to be completed but counsel for Defendant is attached to start trial on March 14th through March 24th.

The parties believe they will not require any additional discovery extensions beyond that which is requested herein. The requested adjusted deadlines are:

Fact Discovery	April 24, 2023
Dispositive Motions	May 26, 2023

FREEMAN LAW

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BY: /s/ Lee J. Janiczek

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Dated: March 14, 2023

So Ordered

J.

CERTIFICATE OF SERVICE

I, Lee Janiczek, Esquire, hereby certify that I caused the foregoing to be filed electronically with the Court, where it is available for viewing and downloading from the Court's ECF system, and that such electronic filing automatically generates a Notice of Electronic Filing constituting service of the filed document upon all counsel of record.

/s/ Lee Janiczek
Lee Janiczek

Date: March 14, 2023